

EXHIBIT G.2



UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

MARK SOKOLOW, et al.,

Plaintiffs,

Civ. No. 04-397 (GBD) (RLE)

v.

THE PALESTINE LIBERATION ORGANIZATION, et al.,

Defendants.

THE SOKOLOW FAMILY PLAINTIFFS' FIRST SET OF INTERROGATORIES
(Interrogatory No. 1)

Pursuant to Rule 33 of the Federal Rules of Civil Procedure and the Local Rules of this Court, Plaintiffs Mark I. Sokolow, Rena M. Sokolow, Jamie A. Sokolow, Lauren M. Sokolow and Elana R. Sokolow ("Plaintiffs"), by counsel, serve the Defendants the Palestinian Authority ("PA") and the Palestine Liberation Organization ("PLO") with the following interrogatories, which Defendants shall answer under oath and in writing within thirty days of the service of these interrogatories.

INSTRUCTIONS AND GENERAL DEFINITIONS

1. Defendants shall respond to these interrogatories as required by the Federal Rules of Civil Procedure and the Local Rules of this Court.
2. The full text of the definitions and rules of construction set forth in Local Civil Rule 26.3(c) and (d) is incorporated by reference herein and governs these interrogatories.

SPECIFIC DEFINITIONS

1. "PA" means and refers to defendant The Palestinian Authority and any ministry, agency, division, bureau, department or instrumentality thereof.

2. "PLO" means and refers to defendant The Palestine Liberation Organization and any agency, division, bureau, department or instrumentality thereof.

3. "Defendants" means and refers collectively to Defendants PA and PLO and any ministry, agency, division, bureau, department or instrumentality thereof.

4. "Letter" means and refers to the letter attached hereto as Exhibit A.

5. "Parties to the Letter" means and refers to Amana Iyaidieh¹, whose name appears at the bottom of the Letter; the two persons who are listed by title as addressees of the Letter (i.e. the commanders of National Security and Political Security as of the date of the Letter); and the persons who made the handwritten notes on the Letter (including, without limitation, "Hilal").

6. "Relevant Persons" means and refers to Wafa Idris (who is mentioned in the First Amended Complaint in this action ("FAC") and died as a result of the January 27, 2002 bombing discussed in the FAC); Munzar Mahmoud Khalil Noor (who is mentioned in the FAC and was also the appellant/appellee in *Prosecutor v. Noor*, Nos. 2793/04 and 1009/05²); Mohammed Muhtasib (who is described in the judgment in *Prosecutor v. Noor* as a PA intelligence officer who is also known as "Abu Talal"); Tawfik Tirawi; and the Parties to the Letter.

INTERROGATORIES

Interrogatory No. 1

Provide the full names and identification numbers of the Relevant Persons and identify and describe in detail any and all positions and/or jobs held by the Relevant Persons in the PA and/or the PLO and any and all work or employment performed by the Relevant Persons for the PA and/or the PLO, at any time, including without limitation a detailed description, for all

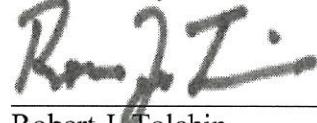
¹ In Arabic the name appears to be spelled: امنة عايدية

² The judgment in those appeals, a copy of which Plaintiffs have provided Defendants, lists Noor's identification number as 902442607.

periods of time, of: (i) the titles, nature, purposes, responsibilities and duties of any and all such positions, jobs, work and/or employment; (ii) the ministries, agencies, divisions, bureaus, departments and/or instrumentalities of the PA and/or PLO in and/or for which the Relevant Persons performed such positions, jobs, work and/or employment; (iii) the rank or ranks held by the Relevant Persons in all such positions, jobs, work and/or employment; (iv) the time periods during which the Relevant Persons held and/or provided such positions, jobs, work and/or employment; (v) the amounts of the payments, salaries and/or other remunerations received by the Relevant Persons for such positions, jobs, work and/or employment specifying the identity of the respective payor(s) of such amounts; and (vi) the names, titles and positions of all officials and/or employees of the PA and/or PLO to whom the Relevant Persons were directly or indirectly subordinate in all such positions, jobs, work and/or employment and (vii) the current employment positions/titles and current employers of all persons named in response to subsection vi *supra*.

September 19, 2011

Plaintiffs, by their Attorney,

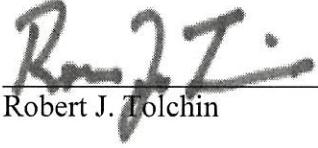


Robert J. Tolchin
111 Livingston Street, Suite 1928
Brooklyn, New York 11201
(718) 855-3627
Fax: (718) 504-4943
RJT@tolchinlaw.com

CERTIFICATION

I hereby certify that on September 19, 2011, I served the within by electronic mail and United States mail on the counsel listed below.

Mark J. Rochon
Richard A. Hibey
Brian A. Hill
MILLER & CHEVALIER CHARTERED
655 15th Street, NW, Suite 900
Washington D.C. 20005-6701



Robert J. Tolchin

Exhibit A



جنة الوطنية الفلسطينية.

قيادة الامن الوقائي

مديرية رام الله

رام

٢٠٠٢/٢/١٤

بسم الله الرحمن الرحيم

الأخ مدير الأمن الوطني حفظه الله

الأخ مدير الأمن السياسي حفظه الله

تحية الوطن وبعد

الموضوع / معلومات خاصة حول موضوع الشهيد وفاته، ادريس

في الليلة التي تم الكشف فيها عن منفذ العملية أنها الشهيدة وفاة ادريس وقبل أن يتم تبني العملية من أي جهة قام مدير المخابرات العامة توفيق الطيراوي بالاتصال هاتفياً ولعدة مرات مع اخ الشهيدة الكبير خليل ادريس يطلب منه أن لا يتم الاعلان من قبل العائلة على أن وفاة هي منفذ العملية وأيما هي تزوجت وسفرت إلى الأردن أو إلى أي مكان آخر ومقابل ذلك يستعد الطيراوي أن يقوم ب تقديم شهادات لخليل للسفر إلى الأردن على الرغم من أنه في قائمة المطلوبين لدى الإسرائييلين وألا يحاب خليل بأنه لا يمكن أن يسع دم الحشيش بهذه الطريقة.

وما تم تلقيده من قبل العائلة أن وفاة في يوم خروجها الأخير لم يظهر عليها أي دليل بأنها لن تعود لها أشراف إلى أنها ذاهبة إلى تلمس واحتمال أن تتلف.

السلام عليكم

مع الاحترام

امانة عايدية

الأمن السياسي